



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

APR 28 2016

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Ms. Laura Pagano
Regulatory Program Manager, Wastewater
San Francisco Public Utilities Commission
525 Golden Gate Avenue
San Francisco, CA 94102

RE: Follow up to April 8, 2016 Meeting Discussing Clean Water Act Section 308(a) Information Request, EPA Docket No. CWA 308-9-16-001

Dear Ms. Pagano:

As discussed during our meeting on April 8, 2016, we are providing examples of processes used by other combined sewer system communities to identify, respond to, and report spills, private property backups, and excursions. This is not intended to be an exhaustive list, nor have we evaluated all of these practices to determine if they would be effective in San Francisco. Each collection system is unique and various practices may evolve over time in response to local conditions or issues. This list is intended to provide San Francisco with different perspectives on how the San Francisco Public Utilities Commission (SFPUC) can improve processes and practices to meet its obligations with respect to identifying, responding to, and reporting instances when sewage overflows the collection system. We are also providing examples of how the SFPUC may identify and report historic excursions which did not have associated work orders, in order to provide a complete response to our February 16, 2016 Request for Information (RFI).

Five examples of sewer overflow response plans adopted by communities with combined sewer systems are presented below with links to their plans, as available. Plans that do not have a link are attached to the email transmittal of this letter. Common to all programs is a procedure to respond to all requests for service by visiting the event location to 1) confirm the overflow, regardless of the destination of the overflow or apparent cause, and 2) determine the appropriate course of action. We have also included two example overflow response plans from separate sanitary sewer systems in California to demonstrate that the process used by operators of such systems is similar to the process used by the operators of combined sanitary sewer systems.

- Example 1 – Hamilton County Metropolitan Sewer District (MSD) – Cincinnati, Ohio
 - Sewer Overflow Response Plan: https://www.msdbg.org/downloads/consent_decree/interim_consent_decree/cd_exhibit_06_SORP.pdf
 - Sewer Backup Response Program: <http://sbu.msdbg.org/sbu/>
- Example 2 – Akron, Ohio
 - Sewer Overflow Response and Notification Plan: Attached to email transmittal of this letter.
- Example 3 – Chattanooga, Tennessee
 - Sewer Overflow Response Protocol: <http://www.chattanooga.gov/images/citymedia/publicworks/ConsentPDR/SewerOverflowResponseProtocol5-5-14EPAApprovedSubmittal.pdf>
- Example 4 – Boston, Massachusetts
 - Sanitary Sewer Overflows Emergency Response Plan: <http://docplayer.net/3990757-Sanitary-sewer-overflows-emergency-response-plan-ssoerp.html>
- Example 5 – Evansville, Indiana
 - Sewer Overflow Response Plan: <https://spext.miamidade.gov/wasdddecree2/Shared%20Documents/Sewer%20Overflow%20Response%20Plan.pdf>
- Example 6 – San Diego, California
 - Appendix C of Sanitary Sewer Management Plan: http://www.sandiegocounty.gov/content/dam/sdc/dpw/WASTEWATER/SewerSystemMgtPlan_Jun2010.pdf
- Example 7 – Laguna Beach, California
 - Overflow Emergency Response Plan: http://lagunabeachcity.net/documents_Large/LagunaOERPFinal72414.pdf

Additionally, as we discussed previously, it is important for the SFPUC to accurately track all excursions, spills, and private property backups in order to appropriately manage and maintain its sewer assets. When the system is properly managed and maintained, the SFPUC can better protect public health and avoid high costs of unplanned repairs and cleanups. EPA expects the

SFPUC to fully respond to EPA's RFI by reporting historic excursions, including those that did not have associated work orders, such as excursions that result from insufficient capacity during wet weather events. This information is important as it will assist both EPA and the SFPUC in determining where, and under what conditions, excursions occur. A more complete record of excursions can help pinpoint root causes and potential solutions including any necessary improvements to address capacity related excursions or otherwise prevent excursions in the future.

The SFPUC asked EPA for information describing how it could identify historic excursions. EPA suggests that historic excursions can be identified by reviewing requests for service stored in its 311 database, stories in media outlets (San Francisco Chronicle, SF Weekly, KTVU, ABC 7 News, and NBC Bay Area News, etc.) that relate to sewage spills in San Francisco, as well as posts on the internet, including social media sites that have photos or video showing evidence of an excursion, especially during wet weather events. The SFPUC may want to start with storms the SFPUC is aware resulted in flooding on December 3, 2014, December 11, 2014, December 2, 2012, and April 12, 2012. Additionally, the SFPUC should further examine whether its model can assist in determining where and when excursions are likely to have occurred in the past.

We are also including links to materials developed or compiled by EPA to assist collection system operators. We urge you to review these materials because they will assist in future discussions. EPA has developed the Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs at Sanitary Sewer Collection Systems, which can assist communities in assessing their collection systems and developing practices to reduce the occurrence of sewer overflows and improve or maintain compliance. The CMOM Guidance is available here: https://www3.epa.gov/npdes/pubs/cmom_guide_for_collection_systems.pdf.

EPA's regional office in New England has developed a Wastewater Collection System Toolbox. This Toolbox is an effort to provide examples of collection system programs from New England and beyond showing the approaches being used to address a wide variety of collection system issues including sewer overflows. The Toolbox does not provide an exhaustive listing or endorse any particular approach, but instead it directs managers, local officials, and other decision-makers to a range of fact sheets, case studies, ordinances, and other information. And while we recognize that a certain approach may not be directly applicable to the SFPUC's system, we hope it might provide new ideas, useful templates, or contacts with other collection system operators. The Toolbox is available here: <https://www3.epa.gov/region1/sso/toolbox.html>.

Our next meeting is scheduled for May 27, 2016 from 9am – noon at our office at 75 Hawthorne Street. The first hour of the agenda will be to discuss the SFPUC's progress with responding to the RFI, methods to identify excursions with no associated work orders, and any further questions regarding the RFI. We plan to spend the next two hours focusing on other areas of the SFPUC's combined sewer system. We will send a detailed agenda in advance of the meeting so that the SFPUC can prepare.

EPA looks forward to further discussions to better understand all operations of the sewer system in the next few months. If you have technical questions please contact Eric Magnan at 415-947-4179 or magnan.eric@epa.gov. Legal questions should be directed to Ellen Blake of the Office of Regional Counsel at 415-972-3496 or blake.ellen@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ken Greenberg", with a stylized flourish at the end.

Ken Greenberg
Manager, Water Section I
Enforcement Division

cc (via email): John Roddy, City and County of San Francisco
Lila Tang, San Francisco Bay Regional Water Quality Control Board
Jim Fischer, State Water Resources Control Board